## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS

| TCF INVENTORY FINANCE, INC., | )                            |
|------------------------------|------------------------------|
| Plaintiff,                   | )<br>)<br>No. 1:19-cv-6896   |
| <b>v.</b>                    | )                            |
|                              | ) Honorable Elaine E. Bucklo |
| CACTUS RV CENTER, LLC,       | )                            |
| and                          | )                            |
| TODD BARRON PERRY,           | )                            |
| Defendants.                  | )                            |

## MOTION FOR ENTRY OF ORDER AND CONSENT JUDGMENT

Plaintiff TCF Inventory Finance, Inc. ("TCFIF") respectfully moves this Court for entry of a consent judgment in this case. In support thereof, TCFIF states as follows:

- 1. TCFIF, Cactus RV Center, LLC, and Todd Barron Perry (collectively, the "Parties") have agreed to the entry of a consent judgment in this case.
- 2. TCFIF requests entry of the Order and Consent Judgment agreed to by the Parties and attached hereto as Exhibit A.

WHEREFORE, Plaintiff, TCF Inventory Finance, Inc., respectfully requests that the Court enter an Order and Consent Judgment in this case in the form attached hereto as <u>Exhibit A</u> and grant such other and further relief as this Court deems proper.

TCF Inventory Finance, Inc.,

By: /s/ Holly H. Campbell
One of its Attorneys

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Attorneys for TCF Inventory Finance, Inc.

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on June 29, 2020, I electronically filed the foregoing **Motion for Entry of Consent Judgment** with the Clerk of the Court, using the CM/ECF system, which sent notification of such filing to all counsel of record.

/s/ Holly Campbell